

REMARKS

This is intended as a full and complete response to the Office Action dated November 26, 2004, having a shortened statutory period for response set to expire on February 26, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-26 are pending in the application. Claims 27-52 remain pending following entry of this response. Claims 1-26 have been cancelled without prejudice. New claims 27-52 have been added to recite aspects previously claimed in claims 1-26 and to capture additional aspects of embodiments of the invention. Applicants submit that the new claims do not introduce new matter.

Claim Rejections - 35 U.S.C. § 101

Claims 1-6 and 7-10 stand rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Examiner takes the position that the claimed method consists solely of manipulation of an abstract idea. The Examiner suggests the claimed "method" be amended to read "computerized method". The new claims present herein by Applicants include appropriate language consistent with the Examiner's suggestion. Therefore, Applicants respectfully request that the rejection be withdrawn.

Claim Rejections - 35 U.S.C. § 102

Claims 1-26 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Kingberg et al.* (U.S. Patent No. 5,734,887, hereinafter "*Kingberg*"). Claims 1-26 have been canceled and claims 27-52 have been added. Accordingly, the rejection is addressed with respect to the new claims.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9

USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim,... *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Kingberg* does not disclose "each and every element as set forth in the claim". Specifically, *Kingberg* does not disclose a method comprising providing a plurality of logical field definitions, each of the definitions comprising a logical field name, at least one location attribute identifying a location of physical data corresponding to the logical field name, and a reference to an access method selected from at least two different access method types; wherein each of the different access methods types defines a different manner of exposing the physical data corresponding to the logical field name of the respective logical field definition; and providing a query specification defining an interface to the plurality of logical field definitions thereby allowing abstract queries to be composed on the basis of the plurality of logical field definitions, as recited in claim 27.

Nor does *Kingberg* disclose a method comprising issuing an abstract query by a requesting entity according to a query specification of the requesting entity; wherein the query specification defines an interface to a data abstraction model defining a plurality of logical field definitions mapping logical fields to the physical data and wherein the abstract query is composed on the basis of the plurality of logical field definitions; and transforming the abstract query into a query consistent with the particular physical data representation according to the data abstraction model depending on which of the plurality of logical fields definitions are referenced by the abstract query, wherein each of the logical field definitions comprises a logical field name, at least one location attribute identifying a location of physical data corresponding to the logical field name, and a reference to an access method selected from at least two different access method types; wherein each of the different access methods types defines a different manner of exposing the physical data corresponding to the logical field name of the respective logical field definition, as recited in claim 35.

Nor does *Kingberg* disclose a computer-readable medium containing a program which, when executed by a processor, performs an operation of providing access to data having a particular physical data representation, the program comprising: a data abstraction model comprising a plurality of logical field definitions each mapping to

different elements of the data; wherein each of the logical field definitions comprises a logical field name, at least one location attribute identifying a location of physical data corresponding to the logical field name, and a reference to an access method selected from at least two different access method types; and wherein each of the different access methods types defines a different manner of exposing the physical data corresponding to the logical field name of the respective logical field definition; wherein the data abstraction model is configured to be referenced by a requesting entity to compose abstract queries on the basis of the plurality of logical field definitions, as recited in claim 38.

Nor does *Kingberg* disclose a computer-readable medium containing a program which, when executed by a processor, performs an operation of accessing data having a particular physical data representation, the operation comprising: receiving an abstract query by a requesting entity according to a query specification of the requesting entity; wherein the query specification defines an interface to a data abstraction model defining a plurality of logical field definitions mapping logical fields to the physical data and wherein the abstract query is composed on the basis of the plurality of logical field definitions; and transforming the abstract query into a query consistent with the particular physical data representation according to the data abstraction model depending on which of the plurality of logical fields definitions are referenced by the abstract query, wherein each of the logical field definitions comprises a logical field name, at least one location attribute identifying a location of physical data corresponding to the logical field name, and a reference to an access method selected from at least two different access method types; wherein each of the different access methods types defines a different manner of exposing the physical data corresponding to the logical field name of the respective logical field definition, as recited in claim 44.

Nor does *Kingberg* disclose a computer, comprising: a memory containing at least: (i) a data abstraction model which maps logical fields to physical entities of data, the data abstraction model comprising a plurality of logical field definitions each mapping to different elements of the data; wherein each of the logical field definitions comprises a logical field name, at least one location attribute identifying a location of physical data corresponding to the logical field name, and a reference to an access

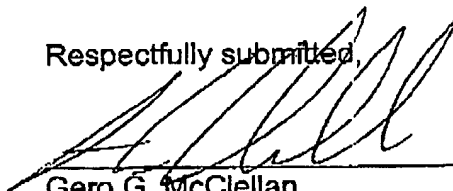
method selected from at least two different access method types; and wherein each of the different access methods types defines a different manner of exposing the physical data corresponding to the logical field name of the respective logical field definition; wherein the data abstraction model is configured to be referenced by a requesting entity to compose abstract queries on the basis of the plurality of logical field definitions; and (ii) a runtime component configured to transform an abstract query, received from the requesting entity, into a query consistent with the particular physical data representation and according to the data abstraction model depending on which of the plurality of logical fields definitions are referenced by the abstract query; and a processor adapted to execute contents of the memory, as recited in claim 49.

Therefore, Applicants submit that claim 27-52 are patentable over *Kingberg*. Withdrawal of the rejection is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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